

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 00-184
)
ROXANNE RICK)

GOVERNMENT'S RESPONSE TO DEFENDANT'S
MOTION TO TERMINATE SUPERVISED RELEASE

AND NOW, comes the United States of America, by and through, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Margaret E. Picking, Assistant United States Attorney for said District, and respectfully submits the within Response to Defendant's Motion to Terminate Supervised Release:

1. The Defendant herein, a physician, was charged with the illegal distribution of Schedules II and III controlled substances during the period covered by the indictment.

2. Her co-defendant, Robert Stowman, was a City of Pittsburgh police officer at the time these offenses were committed.

3. The government's evidence clearly showed that Stowman acted as "muscle", that is, as an enforcer for Roxanne Rick in her illicit drug trafficking activity.

4. Co-defendant Stowman initially received a ten year mandatory minimum sentence for his involvement in these offenses. This sentence was based in part upon evidence that Stowman threatened an undercover DEA agent with a Glock handgun in defendant Rick's presence during the final transaction. Stowman

eventually received a reduction in sentence for his drug trafficking activity, due to a change in the United States sentencing guidelines.

5. The government opposes Defendant Rick's Motion for Early Termination of Supervised Release. The offenses for which defendant was convicted were serious and the Defendant violated her oath as a physician and abused a position of trust in their commission.

6. While the government may not oppose early termination of supervised release at a future date for this Defendant, the government believes that such motion at this time is far too premature. The government does not believe that the Defendant has paid her debt to society based on the severity of these offenses and does not believe the conditions of supervised release which she is currently serving are particularly onerous.

7. Accordingly, the government opposes Defendant's Motion for Early Termination of Supervised Release.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within pleading was served by electronic mail to and upon the following:

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